

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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ALINA BOYDEN and  
SHANNON ANDREWS,

Plaintiffs,

Case No. 17-cv-264

v.

STATE OF WISCONSIN DEPARTMENT  
OF EMPLOYEE TRUST FUNDS, et al.,

Defendants.

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**PLAINTIFFS' RULE 26(A)(3) DISCLOSURES**

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Pursuant to Fed. R. Civ. P. 26(a)(3), Plaintiffs, Alina Boyden and Shannon Andrews, by and through their undersigned attorneys, make the following pretrial disclosures:

**I. Rule 26(a)(3)(A)(i)**

Plaintiffs identify the following individuals as witnesses they expect to present at trial:

1. Plaintiff, Alina Boyden;
2. Plaintiff, Shannon Andrews;
3. Stephanie L. Budge, Ph.D.;
4. Loren S. Schechter, M.D.;
5. Robert J. Conlin (adversely);
6. Herschel E. Day (adversely);

7. Michael S. Farrell (adversely);
8. Nancy L. Thompson (adversely);
9. J.P. Wieske (adversely);
10. Lisa M. Ellinger (adversely); and
11. Joan Barrett, M.A.

**Witnesses Plaintiffs May Call if the Need Arises**

1. David H. Nispel;
2. Tara S. Pray;
3. Jeffrey E. Bogardus;
4. Stacey Rolston;
5. Charles Grapentine;
6. Waylon Hurlburt;
7. Theodore Neitzke;
8. Bob Ziegelbauer;
9. Jennifer Stegall;
10. Francis Sullivan;
11. Any witness listed on Defendant's witness list; and
12. Any witness necessary for rebuttal.

**II. Rule 26(a)(3)(ii)**

Plaintiffs anticipate presenting testimony by deposition designation for the following witnesses if those witnesses are not called by either plaintiffs or defendants at trial:

1. Robert J. Conlin;
2. David H. Nispel;
3. Michael S. Farrell;
4. Nancy L. Thompson;
5. Jeffery E. Bogardus;
6. J.P. Wieske;
7. Tara S. Pray; and
8. Lisa M. Ellinger.

### III. Rule 26(a)(3)(iii)

Please see the Exhibit Form attached hereto. Plaintiffs reserve the right to rely on documents identified by Defendants in their pretrial report, any exhibits needed for impeachment, and any exhibits necessary for rebuttal.

Dated this 7th day of September, 2018.

**HAWKS QUINDEL, S.C.**

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